

DT/5511/2022-23

13.12.2022

Mr. Pradeep Ramakrishnan,
Deputy General Manager,
DDHS
Securities & Exchange Board of India,
SEBI Bhavan, C-4A, G-Block,
Bandra Kurla Complex,
MUMBAI 400 051

Dear Sir,

**Re: Review of Regulatory Compliance, Periodic Reporting - Half
yearly report for half year ending 30.09.2022**

We refer to your circular No. SEBI/ HO/ MIRSD/ CRADT/ CIR/ P/ 2020/23 dated 12.11.2020 further amendment with respect to timelines were issued vide SEBI Circular dated 19.05.2022 on the captioned subject.

We now enclose the statement in the prescribed format for the half year ending on 30.09.2022 for your perusal.

Thanking you,

Yours faithfully,



Compliance Officer



Encl: as above



REPORT OF DEBENTURE TRUSTEES FOR THE HALF YEAR ENDED SEPTEMBER 30,2022**NAME - CATALYST TRUSTEESHIP LIMITED****REGISTRATION NO. IND000000034****DATE OF REGISTRATION - May 1998****SECTION I : ACTIVITIES****Activities other than debenture trusteeship (Outstanding as on September 30, 2022)**

Activity Type	Description of the activity	Number of clients
Services relating to securitisation transactions	Lender sells the loans portfolio to other lending company, but continues recovery proceedings as agent for purchaser. Through mechanism of trusteeship, the compliance of covenants by contracting parties is ensured.	194
Public Deposit	Acting as the Trustee for the public deposits accepted by the companies as per the guidelines issued by RBI.	7
Giving back-office functioning of employees benefit trust funds	Back-office functioning of provident fund trusts of exempted companies.	17
Security Trusteeship in respect of consortium finance by Banks and financial institutions	Acting as Security Trustee for and on behalf of lender Banks and financial institutions	896
Shares Pledge Trustee	Holding shares under pledge for creditor	36
Escrow Agent	Holding property /shares on behalf of contracting parties, subject of terms and conditions between them.	69
Alternate Investment Fund (AIF)	Acting as trustee for the Investor / Contributor	103
Software Escrow Trusteeship	Placing of source code developed by software vendor of computer programs, used by Banks, Companies Organisation with a trusted third party.	21
Safe Keeper	Holding the original documents viz. title deeds, share certificates etc. on behalf of Lenders/investors for safe custody.	57
Facility Agent	Representing Lender(s) and our role inter alia includes Dissemination of information between the Parties to the transaction, Monitor pre-execution and post execution compliance of conditions, Monitor and confirm compliance of pre-disbursement conditions, Convening meetings of the parties to the transaction, Obtain information regarding compliance with terms from the parties.	51

Name of Compliance Officer**Email ID****13.12.2022**

Rakhi Kulkarni

dt@ctftrustee.com

SECTION - IV - COMPLIANCE

Name of the DT - CATALYST TRUSTEESHIP LIMITED

COMPLIANCE CERTIFICATE FOR THE HALF YEAR ENDED September 30, 2022

A. No Conflict of interests with other activities

The activities other than debenture trusteeship performed by DT are not in conflict with DT activities and appropriate systems and policies have been put in place to protect the interests of debenture holders

B. Change in status or constitution

Reporting of 'changes in status or constitution' of DT (In terms of SEBI Circular No. CIR/MIRSD/10/2011 dated June 20, 2011)

Name of the Person	Appointment / Resignation	Designation	Date of Appointment /
NIL	NIL	NIL	NIL

C. Other Information

(i) Details of arrest / Conviction of key officials of DT

_____ NIL _____

(ii) Details of prosecution cases of criminal complaints filed by investors against the DT

_____ NIL _____

(iii) Details of any fraudulent activity by the employees associated with DT activities and action taken by the DT

_____ NIL _____

(iv) Details of conviction of any offence involving moral turpitude or any economic offence by employees of DT

_____ NIL _____

(v) Action taken by the DT on the above issues

_____ NIL _____

13.12.2022

Name of Compliance Officer : Rakhi Kulkarni

Email ID : dt@ctltrustee.com

Catalyst Trusteeship Ltd. IND000000034

D. Compliance with registration requirements

Certified that the requirements specified for SEBI registrations as DT are fulfilled, the details are as under:

(i) Net worth as defined in the Regulations as on Half Yearly ended 30.09.2022
(as per the latest Unaudited financials)

73,36,79,600

(ii) Any change in infrastructure since the last report / registration / renewal

NIL

(iii) Changes in Key Personnel during the half year ended 30.09.2022

Names of key personnel	Appointment / Cessation	Date of appointment / cessation	Qualification	Experience	Functional areas of work
Umesh Manohar Salvi	Appointment	01.04.2022	BE (Electronics) MBA (Finance)	15	1.Represent the Company wherever necessary, including regulatory authorities, Govt. Authorities, statutory, legal forums 2.Prepare and implement comprehensive business plans to facilitate achievement by planning cost-effective operations and market development activities 3.Develop and execute the Company's business strategies to attain the goals 4.To review and apprise the Board of Directors of the operations of the Company
Pravin Hari Kutumbe	Appointment	01.04.2022	Chartered Accountant	33	1.Formulating business plans, strategies and monitoring operations of the Company 2.Setting the budget for the company's operations and keeping tabs on the profit and loss margin 3.Ensure regulatory compliances by the Company
Rewati Sudhir Paithankar	Appointment	01.04.2022	Chartered Accountant Diploma in Information System Audit Doctoral Degree (Ph. D.)	35	1. Formulating business plans, strategies and monitoring operations of the Company 2.Setting the budget for the company's operations and keeping tabs on the profit and loss margin 3.Ensure regulatory compliances by the Company

E. Details of deficiencies and non-compliances:

NIL

F Details of the review of the report by Board of Directors

*Date of Board Review -

Observation of the Board of Directors on:

(i) the deficiencies and non compliances

(ii) corrective measures initiated

* Board meeting will be conducted in the month of June in compliance with timeline specified in Companies Act.

Certified that we have complied with SEBI (Debenture Trustee) Regulations, 1993, applicable provisions of SEBI (Issue and Listing of Debt Securities) Regulations, 2008, Circulars issued by SEBI and any other laws applicable from time to time ~~except the deficiencies and non-compliances those specifically reported at Section IV (E) above~~

*Adoption of the Standalone and Consolidated Financial Statements of Catalyst for the FY ended March 31, 2023 will be in next year first quarter Board Meeting

13.12.2022

Name of Compliance Officer : Rakhi Kulkarni

Email ID : dt@ctltrustee.com